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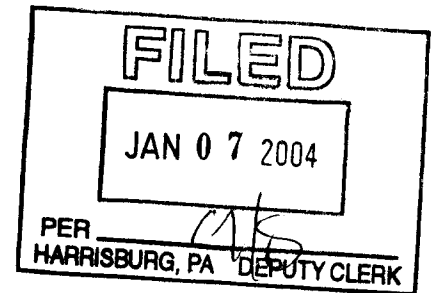
**IN THE UNITED STATE DISTRICT COURT**  
**FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**Tyrone, James**  
**- Plaintiff**

**CIVIL NO. 1:01-CV-1015**  
**(Kane, J.)**

**-VS-**

**York County Police Department**  
**Agent James H. Morgan,**  
**Det. Richard Peddicord,**  
**Det. Raymond E. Craul,**  
**Sergeant Gene Fells,**  
**Det. Kessler, Wesscwiski,**  
**Westmoreland Sipe,**  
**CO Baylark & the York**  
**County Prison**



**PLAINTIFF'S TYRONE JAMES, REQUEST TO SERVED**  
**DEFENDANTS SECOND SET OF INTERROGATORIES**

Plaintiff, Tyrone James, hereby moves the Honorable Court to grant him leave(s) to served defendant set of interrogation on state & county defendants, upon represent, hereby avers to the following:

- (1) Plaintiff's civil matter is related to the use of excessive force, excessive bond; failure to mirandize & denial of counsel, which deals with the credibility determination of state & county defendants.
- (2) The answers to interrogations; in Plaintiff's first set of interrogations, the defendant's, by Plaintiff are inadequate, incomplete & overbroad; which regard to any disciplinary actions or forms law suit filed against the defendant by any other person; showing pattern, or as to their education & physical training; and as to any form of excessive use of force

or as to their education & physical training; and as to any form of excessive use of force which occurred in the past by state defendants on any other person; their mental & racial background and any discipline received by the state Attorney General's Office; state insurance & their financial status.

- (3) State defendant's failed to provide answers to plaintiff's first set of interrogations; precisely as to the defendants Morgan, Caul & Sipes, inadequate & complete information between the interval of investigation was started on January 8th, upon the time of plaintiffs arrest & interrogation & his request for counsel; and miranda warning.
- (4) Defendant Sipe, first set of interrogations, served upon counsel, is outstanding and overdue.
- (5) States defendant's answer to plaintiff's first set of interrogations are inadequate, incomplete; and also improper objections.

**Wherefore**, plaintiff hereby requests this Honorable Court to grant him leave to file second set of interrogations upon state defendants Morgan, Kessler, Craul, Peddicord, Fells, Wesscveski & Sipes; and order defendant's to answer interrogations within thirty (3) days after being served thereof, under penalty of further sanctions, pursuant to Fed. K. Civ. P. 37(a).

***Respectfully Submitted:***



**Tyrone James # 62154  
3400 Concord Road  
York, PA 17402-9007**

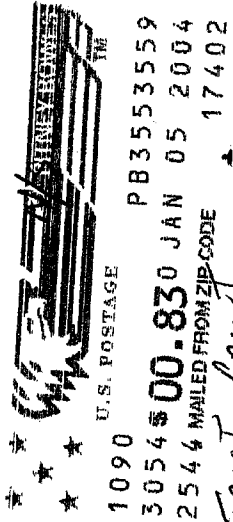
THIS CORRESPONDENCE ORIGINATES  
FROM AN INMATE INSTITUTION

from  
Tyronne James

62154

YORK COUNTY PRISON  
3400 Concord Road  
York, PA 17402

Legal Mail



1/2 Clerk of THE DISTRICT Court

U.S. DISTRICT COURT  
228<sup>th</sup> WALNUT STREET  
P.O. BOX 983  
HARRISBURG, PA 17108

